UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



BILL OF INFORMATION FOR BRIBERY AND CONSPIRACY CONCERNING PROGRAMS RECEIVING FEDERAL FUNDS

UNITED STATES OF AMERICA * CRIMINAL NO.

v. * SECTION:

AARON BENNETT * VIOLATION: 18 U.S.C. § 371

18 U.S.C. § 666(a)(2)

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* * *

The United States Attorney charges that:

COUNT 1

A. <u>AT ALL TIMES MATERIAL HEREIN:</u>

- The defendant, AARON BENNETT, owned, operated and controlled various corporate identities, including Benetech, LLC.
- The defendant, AARON BENNETT, acted as the Chief Executive
 Officer of Benetech, LLC.
- 3. The Plaquemines Parish Sheriff's Office was a local government/political subdivision of the State of Louisiana (located within the Eastern District of

- Louisiana) that received federal assistance in excess of \$10,000 annually from 2008 through the date of this Bill of Information.
- 4. Irvin F. Hingle, a/k/a Jiff Hingle ("Hingle"), was an agent of the Plaquemines Parish Sheriff's Office in his capacity as the duly-elected Sheriff.
- 5. On or about October 1, 2007, the Plaquemines Parish Sheriff's Office entered into a contract with Benetech to provide project management services relating to specific requirements for recovery from damages due to previous and future disasters.

B. THE CONSPIRACY:

Beginning in or near March, 2008, and continuing through May, 2011, in the Eastern District of Louisiana, and elsewhere, the defendant, **AARON BENNETT**, and others known and unknown to the United States Attorney, did knowingly and willfully combine, conspire and agree with each other to corruptly give, offer, and agree to give something of value to Hingle, that is, \$20,000.00 in payments intending to influence and reward Hingle in connection with a series of Plaquemines Parish Sheriff's Office transactions involving something of value of \$5,000 or more, in violation of Title 18, United States Code, Section 666(a)(2).

C. OVERT ACTS:

On or about the following dates, in furtherance of and to conceal the conspiracy and accomplish its purposes, the defendant, **AARON BENNETT**, and others, committed the following overt acts, among others, in the Eastern District of Louisiana and elsewhere:

1. In or near March, 2008, the defendant, **AARON BENNETT**, made a \$10,000 cash payoff to Hingle shortly after Hingle approved and paid invoices

- submitted to the Plaquemines Parish Sheriff's Office by the defendant, **AARON BENNETT**.
- 2. In or near April, 2008, the defendant, **AARON BENNETT**, made a \$10,000 cash payoff to Hingle shortly after Hingle approved and paid invoices submitted to the Plaquemines Parish Sheriff's Office by the defendant, **AARON BENNETT**.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

- A. The allegations contained in Section A of Count 1 are realleged and incorporated as if fully set forth herein.
- B. On or about August 3, 2011, in the Eastern District of Louisiana, the defendant, **AARON BENNETT**, did corruptly give, offer, and agree to give a thing of value to Irvin F. Hingle, a/k/a Jiff

 Hingle ("Hingle"), intending to influence and reward Hingle, an agent of the Plaquemines Parish

 Sheriff's Office in his capacity as the duly-elected Sheriff, a local government/political subdivision

 of the State of Louisiana which received federal benefits in excess of \$10,000.00 in a one-year

 period, in connection with any business, transaction, and series of transactions of the Plaquemines

 Parish Sheriff's Office involving something of value of \$5,000.00 or more, that is, the defendant,

AARON BENNETT, made a cash payoff of \$10,000 to Hingle, in violation of Title 18, United States Code, Section 666(a)(2).

JIM LETTEN #8517

UNITED STATES ATTORNEY

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New Orleans, Louisiana October 5, 2011